

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CASE NUMBER 08-CV-1722**

GD DEAL HOLDINGS, LLC

PLAINTIFF

v.

SURINDER MULTANI, et al.

DEFENDANTS

**MOTION FOR DEFAULT JUDGMENT AND
ENTRY OF CHARGING ORDER AGAINST
JUDGMENT DEBTOR'S INTEREST IN JGG INVESTMENTS, LLC**

Comes now the Plaintiff, GD Deal Holdings, LLC ("GD Deal Holdings"), by and through counsel, and, pursuant to FED. R. CIV. P. 54, FED. R. CIV. P. 69, and 805 ILCS 180/30-20, for its Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in JGG Investments, LLC ("JGG Investments"), states as follows:

1. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate of 4.9% per annum from the date of judgment until paid.

2. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.

3. GD Deal Holdings is informed, and on the basis of such information and belief alleges, that Surinder Multani is a member of JGG Investments. A copy of a printout from the Illinois Secretary of State's website demonstrating that the principal office for JGG Investments is the same principal business office address for Surinder Multani is attached hereto as "Exhibit A".

4. JGG Investments was served with process on April 1, 2008, and has failed to file responsive pleadings herein within twenty (20) days thereafter, said Defendant being in default. A

copy of the certified mail receipt for the Summons served on the registered agent for JGG Investments is attached hereto as "Exhibit B".

5. GD Deal Holdings is entitled, under FED. R. CIV. P. 69 and 805 ILCS 180/30-20, to a charging order against the interest of Surinder Multani in JGG Investments.

6. The instant Motion is based on the Affidavit of counsel for GD Deal Holdings, attached hereto as "Exhibit C", and all the pleadings, records and papers on file in this action.

WHEREFORE, the Plaintiff, GD Deal Holdings, LLC, requests:

1. An Order requiring JGG Investments to produce a copy of all agreements concerning Surinder Multani's interest and the interest of other members in JGG Investments, together with evidence showing the interest of Surinder Multani in the income of JGG Investments;

2. A charging order against Surinder Multani's interest in JGG Investments or any other entity or joint venture in which Surinder Multani has an interest; and

3. Such further relief, at law or in equity, that the Court deems just and proper.

This day, July 23, 2008.

THOMAS M. FALKENBERG
WILLIAMS MONTGOMERY & JOHN LTD.
20 North Wacker Drive, Suite 2100
Chicago, Illinois 60606-3094
Telephone: (312) 443-3200

-and-

HARNED, BACHERT & DENTON, LLP
324 East Tenth Avenue
Post Office Box 1270
Bowling Green, Kentucky 42102-1270
Telephone: (270) 782-3938

/s/ Scott A. Bachert
SCOTT A. BACHERT

CERTIFICATION:

This is to certify that a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court this day, July 23, 2008, by using the CM/ECF system, which will send a notice of electronic filing to the following:

Hon. Lucia Nale
Hon. Diane Renae Sabol
Hon. Nicole J. Highland
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 630606-4637

Hon. Robert T. Kuehl
WELTMAN, WEINBERG & REIS CO., L.P.A.
180 N. LaSalle Street, Suite 2400
Chicago, Illinois 60601

This is to certify that a true and correct copy of the foregoing document was this day, July 23, 2008, placed in the US Mail, postage prepaid, addressed to the following:

Hon. Leroy Simms
6061 Savoy Drive
Houston, Texas 77036

Sapphire Supply, LLC
c/o: Surinder Multani, Registered Agent
2015 S. Arlington Hts. Rd. #120
Arlington Heights, Illinois 60005

Hon. James O. Stola
3701 West Fullerton Avenue
Chicago, Illinois 60647

JGG Investments, LLC
c/o: Kishor Shah, Registered Agent
5 Whippoorwill Court
Roselle, Illinois 60172

Surinder Multani
302 Midwest Club
Oak Brook, Illinois 60523

ABBE Capital and Leasing, LLC
c/o: Surinder Multani, Registered Agent
2015 S. Arlington Hts. Rd. #120
Arlington Heights, Illinois 60005

Safanpreet Multani
302 Midwest Club
Oak Brook, Illinois 60523

ABBE Management Group, LLC
c/o: Robert S. Luce, Registered Agent
399 Quentin Rd. Ste. A
Palatine, Illinois 60067

Surinder Multani
24 Bright Ridge Drive
Schaumburg, Illinois 60194

Babaji PS, LLC
c/o: Narendra Bhalla, Registered Agent
1718 Fry Road, Suite 415
Houston, Texas 77084

Safanpreet Multani
24 Bright Ridge Drive
Schaumburg, Illinois 60194

ABBE Properties, LLC
c/o: Surinder Multani, Registered Agent
2015 S. Arlington Hts. Rd. #120
Arlington Heights, Illinois 60005

Capital Access & Investments, LLC
c/o: Narendra Bhalla, Registered Agent
1718 Fry Road, Suite 415
Houston, Texas 77084

G & S Portage, Inc.
c/o: Ajai Agnihotri, Registered Agent
1856 Samuelson Road
Portage, Indiana 46368

/s/ Scott A. Bachert
SCOTT A. BACHERT


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| | | | |
|---------------------------|------------------------------------|-------------------|---|
| Entity Name | JGG INVESTMENTS, LLC | File Number | 01446797 |
| Status | GOODSTANDING | On | 03/12/2008 |
| Entity Type | LLC | Type of LLC | Domestic |
| File Date | 03/09/2005 | Jurisdiction | IL |
| Agent Name | KISHOR SHAH | Agent Change Date | 03/09/2005 |
| Agent Street Address | 5 WHIPPOORWILL COURT | Principal Office | 2015 S ARLINGTON HTS RD #120 ARLINGTON HEIGHTS 600064150 |
| Agent City | ROSELLE | Management Type | MGR |
| Agent Zip | 60172 | Dissolution Date | PERPETUAL |
| Annual Report Filing Date | 03/12/2008 | For Year | 2008 |
| Series Name | NOT AUTHORIZED TO ESTABLISH SERIES | | |

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| 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes | | C. Signature X Kishor | |
| 1. Article Addressed to: JGG Investments, LLC c/o Kishor Shah, Registered Agent 5 Whippoorwill Court Roselle, IL 60172 | | <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee D. Is delivery address different from item 1? If YES, enter delivery address below: | |
| 27752.00BUBV | | 1FF | |
| PS Form 3811, January 2005 | | Domestic Return Receipt | |

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CASE NUMBER 08-CV-1722**

GD DEAL HOLDINGS, LLC

PLAINTIFF

v.

SURINDER MULTANI, et al.

DEFENDANTS

AFFIDAVIT OF SCOTT A. BACHERT

Scott A. Bachert, being sworn, deposes and says:

1. He is attorney for GD Deal Holdings, LLC, Plaintiff and judgment creditor in the above-entitled action, and makes this Affidavit in support of Plaintiff's foregoing Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in JGG Investments, LLC.

2. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate of 4.9% per annum from the date of judgment until paid.

3. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.

4. The judgment remains outstanding and unsatisfied.

5. Affiant is informed and believes, and on that basis alleges, that Surinder Multani is a member of JGG Investments, LLC and the interest of Surinder Multani may properly be charged with the unpaid judgment in this action.

6. JGG Investments, LLC was served with process on April 1, 2008.

7. JGG Investments, LLC has failed to file responsive pleadings herein.

8. Affiant has received no pleadings or papers from JGG Investments, LLC.

This the 27th day of July, 2008.

Scott A. Bachert
SCOTT A. BACHERT

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF WARREN)

Subscribed, sworn to and acknowledged before me by Scott A. Bachert, on this the 23rd
day of July, 2008.

Sheila Stephens
NOTARY PUBLIC
My Commission Expires: 8/25/09



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CASE NUMBER 08-CV-1722

GD DEAL HOLDINGS, LLC

PLAINTIFF

vs. **DEFAULT JUDGMENT AS AGAINST JGG INVESTMENTS, LLC**
AND ORDER ENTERING CHARGING ORDER

SURINDER MULTANI, et al.

DEFENDANTS

** ** *

This matter having come before the Court on GD Deal Holdings, LLC's Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in JGG Investments, LLC, the Court finds as follows:

1. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate.
2. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.
3. The judgment has not been satisfied.
4. GD Deal Holdings, LLC is entitled as a matter of right under 805 ILCS 180/30-20 to a charging order against any interest of Surinder Multani in a limited liability company. There is no just reason for delay in entry of a charging order.
5. Surinder Multani is a member of JGG Investments, LLC.
6. JGG Investments, LLC was served with process and a copy of the Complaint on April 1, 2008 and has failed to file responsive pleadings; therefore, being in default.

THEREFORE, IT IS ORDERED that the Plaintiff's Motion for Default Judgment is GRANTED.

IT IS FURTHER ORDERED by the Court that the interest of Surinder Multani as a member of JGG Investments, LLC be and is hereby subjected to an encumbrance and charging order in favor of and for the benefit of GD Deal Holdings, LLC.

IT IS FURTHER ORDERED by the Court that JGG Investments, LLC pay over to GD Deal Holdings, LLC such amounts as may from time to time become payable or distributable to Surinder Multani by reason of his interest in JGG Investments, LLC.

IT IS FURTHER ORDERED by the Court that Surinder Multani pay to GD Deal Holdings, LLC such amounts as may from time to time become payable or distributable to Surinder Multani by reason of his interest in JGG Investments, LLC.

IT IS FURTHER ORDERED by the Court that JGG Investments, LLC produce, within fifteen (15) days of the date of this Order, a copy of all operating agreements for JGG Investments, LLC and/or any other agreement controlling the interest of Surinder Multani, with such documents to be provided to GD Deal Holdings, LLC's attorney, together with evidence showing the value of the capital and/or income attributable to the interest of Surinder Multani in JGG Investments, LLC and copies of any and all tax returns filed during the last three (3) years on behalf of JGG Investments, LLC.

IT IS FURTHER ORDERED by the Court that JGG Investments, LLC file with the Clerk of this Court, within fifteen (15) days of the date of this Order, a sworn statement reporting to the Court all amounts distributable or payable to Surinder Multani at the time of this Order. In such sworn statement, JGG Investments, LLC shall state the value at the time of entry of this Order of both the capital and income account attributable to Surinder Multani's interest in JGG Investments, LLC.

Jurisdiction is retained for such further orders and proceedings as may be necessary.

DATED, this the _____ day of _____, 2008.

JUDGE, UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Tendered by:

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-and-

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/s/ Scott A. Bachert
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